

May 18, 2021

Jaime López
Senior Physical Scientist
Clean Water Act Team
Multimedia Permits and Compliance Branch
Caribbean Environmental Protection Division
U.S. Environmental Protection Agency, Region 2
Email: lopez.jaime@epa.gov

RE: Request for Information Pursuant to Section 308 of the Clean Water Act Finca de Sueño Aurora Residential Development
2017 CGP NPDES ID: PRR1000A9
CEPD-CWA-02-IR-2020-022

Dear Mr. Jaime López,

Per EPA's request for information (RFI) dated April 19, 2021, I hereby submit the responses to all your questions and supporting documents. A copy of the RFI is included in Attachment 1.

Documents and Information Requested

Pursuant to Section 308(a) of the CWA, please submit the following information:

The name of the owner(s) of the Project's site, and their addresses, phone numbers, and emails.

Response:

<i>Name of Owner(s) of the Project Site</i>	<i>Aurora's Dreams LLC</i>
	<i>Jorge Vaz Ramirez</i>
<i>Address</i>	<i>PO Box 366751, SJ PR 00936</i>
<i>Phone Number</i>	<i>787-983-7007</i>
<i>Email</i>	<i>jvaz@bellagiocorp.com</i>

1. A copy of the deed(s) where the Project is being developed.

Response:

See Attachment 2 for a copy of the Project's property deed.

2. The names of all past and present contractors engaged in conducting clearing, grading and/or excavation activities during the construction of the Project. Include a description of their roles and respective activities during the construction of the Project, their addresses, phone numbers, emails and names of their officers

Response:

All earthwork activities have been completed by Bellagio, LLC (formerly known as Bellagio Corp.). Bellagio, LLC is the general contractor in charge of all construction works.

<i>Name of General Contractor:</i>	<i>Bellagio, LLC</i>
<i>Physical Address:</i>	<i>Carr 838 Camino Alejandrino Km. 5.2 Plaza Alejandrino Suite 118 Guaynabo, PR 00969</i>
<i>Mailing Address</i>	<i>PO Box 366751, SJ PR 00936</i>
<i>Phone Number</i>	<i>787-983-7007</i>

<i>Official Name</i>	<i>Title</i>	<i>Email</i>
<i>Jorge Vaz Ramirez</i>	<i>President/Single Owner</i>	<i>jvaz@bellagiocorp.com</i>

3. A copy of the construction contracts between Bellagio and all past and present contractors engaged in conducting clearing, grading and/or excavation activities at the Project' site. If there was an oral agreement to conduct these activities, explain the terms of such agreement and the names of the persons involved.

Response:

Bellagio, LLC is the general contractor in charge for all construction activities. All earth work activities have been completed solely by Bellagio and no sub-contracting exists for such purposes. A copy of the construction contract between the owner (Aurora's Dream, LLC) and Bellagio for all construction activities is included in Attachment 3.

4. The date when earth movement activities started at the Project's site.

Response:

Earth work activities for field studies (surveying and geotechnical) was conducted during the months of January and February 2019. At this stage approximately 0.6 acres were cleared to complete the topographic surveying and geotechnical soil samples.

Earth work activities for site development started on November 15,2020

5. The name of the entity that initiated the earth movement activities at the Project's site.

Response:

Bellagio LLC, initiated earth work activities and is the only entity performing construction work on-site.

6. The total area of surface soil (in acres) that has been disturbed at the Project's site as of the date of this letter.

Response:

The total area of surface soil that been disturbed at the Project's site as of April 19, 2021 is approximately 2 acres.

7. The total area of surface soil (in acres) that will be disturbed at the Project's site at the completion of the construction activities.

Response: The total area of surface soil that will be disturbed at the Project's site at the completion of the construction activities is approximately 2.8 acres.

8. The date when construction activities at the Site are expected to be completed. Refer to Part 8 of the 2017 CGP.

Response:

The construction activities at the Site are expected to be completed by May 31st, 2022.

9. A legible copy of any land surveys, soil studies, and hydrologic/hydraulic studies that had been prepared for the Site. Include any legible picture depicting the areas in the Project's site where earth movement activities had been conducted as of the date of this letter.

Response:

Attachment 4 includes a colored site plan showing impacted areas as well as the land surveying plan, soil study and hydrologic/hydraulic study completed for the Site.

10. A color copy of all available aerial photographs taken by Bellagio during the construction of the Project.

Response:

Attachment 5 includes all available aerial photographs taken by Bellagio during the construction of the Project.

11. A description of the erosion and sediment controls and soil stabilization practices that had been applied at the Project's site since prior to the initiation of earth movement activities to the date of this letter. Refer to Part 2 of the 2017 CGP.

Response:

The following erosion and sediment control stabilization practices have been applied at the Project's site:

- a. Silt Fence Installation on the site perimeter*
- b. Erosion Control Blanket Installation on parking area*

- c. *Sediment Pond Construction*
- d. *Erosion Control Blanket Installation along main access road*
- e. *Vehicle truck washing area*

12. A legible map showing the features of the Project's site. Indicate in the legible map, the areas of the Project's site impacted by the earth movement activities and the areas in which soil stabilization had been applied. Refer to Part 2.2.14 of the 2017 CGP.

Response:

Attachment 6 show a map indicating the impacted area by the earth movement activities and the areas in which soil stabilization had been applied. The Process Map show by color the impacted area by the earth movement activities and the letters represents the respective field photo folder of each stabilization actions.

13. A copy of the inspection reports from the initiation of the earth movement activities up to the date of this letter. Indicate the names of the individuals that performed the site inspections and their qualifications to conduct the inspections.³ Refer to Part 4 of the CGP.

Response:

A copy of the inspection reports is presented in Attachment 7. All inspection reports were completed by the project's resident inspector, Engineer Xavier Cales (PE-21859).

14. A copy of all corrective action reports from the initiation of the earth movement activities up to the date of this letter. Refer to Part 5 of the 2017 CGP.

Response:

A copy of all correctives action log report is presented in Attachment 7

15. A copy of the Storm Water Pollution Prevention Plan ("SWPPP"), including amendments thereto, developed for the Project. Refer to Part 7 of the 2017 CGP.

Response:

A copy of the Storm Water Pollution Prevention Plan ("SWPPP") is presented in Attachment 8

16. A copy of the projected schedule for the Development. Refer to Part 7.2.3.f. of the 2017 CGP.

Response:

The Attachment 9 shows the project site schedule.

17. A detailed description of how storm water runoff was managed at the Site since the initiation of the earth movement activities to the date of this letter. Refer to Part 7.2.6 of the 2017 CGP.

Response:

The stormwater runoff from the Project drains from the center of the parcel to west, south and east of the facility. During the earth movements activities, the project site keeps the same discharge's point location. To manage the stormwater runoff since the initiation of the earth movement activities, a silt fence was installed around the project site to retain the soil and dissipate the runoff discharge to west south and east of the facility.

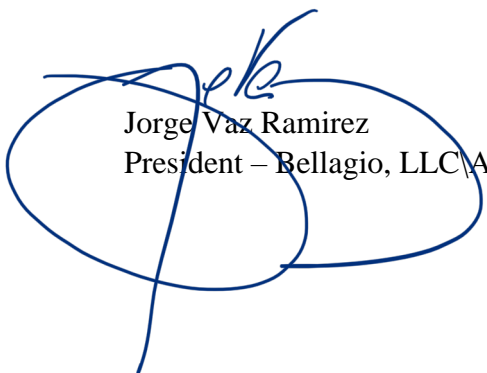
Additional to the silt fence, a sedimentation pond was incorporated at east of the facility to recollect runoff which discharge to municipal road, decreasing the runoff and controlling the sediment discharge off-site of the project. Erosion control blankets are placed over exposed slopes after slope compaction is completed.

18. A copy of all staff training documentation for the Project. Refer to Part 7.2.8 of the 2017 CGP.

Response:

The Attachment 10 show the staff training documentation.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



Jorge Vaz Ramirez
President – Bellagio, LLC Aurora's Dream, LLC

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Attachment 1: Request for Information Pursuant to Section 308 of the Clean Water Act

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RE: 2017 CGP NPDES ID: PRR1000A9
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Attachment 2: Copy of Deed

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Attachment 3: Copy of the Construction Contracts

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Attachment 4: Copy of Land Surveys, Soil Studies, and Hydrologic/Hydraulic Studies

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Attachment 5: Aerial Photographs During the Construction of the Project.

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Attachment 6: Project Site Plan with Impacted Zones and Stabilization Actions Locations and Field Photos.

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Attachment 7: Copy of the Inspection Reports

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Attachment 8: Storm Water Pollution Prevention Plan (“SWPPP”)

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Attachment 9: Projected Schedule

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Attachment 10: Staff Training Documentation